



ORDER MONITORING VERIFICATION/ INVESTIGATION PROGRAM

Policies and Procedures

Policy Number: **CSRA 2.12**
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PURPOSE

To ensure compliance with applicable state and federal regulations, AmerisourceBergen Corporation (ABC) has designed this program to review the ordering activity of its customers to identify the existence of possible excessive or suspicious orders of controlled substances and/or listed chemical products.

POLICY

The Corporate Security & Regulatory Affairs (CSRA) department and Distribution Center Management will be responsible for identifying potential excessive or suspicious customer ordering activity of controlled substances and/or listed chemical products and will initiate appropriate investigative steps when possible indicators of such activity are identified. As part of this effort, all ABC associates are expected to report to the CSRA department any information regarding potential excessive or suspicious orders of controlled substances and/or listed chemical products by any ABC customer.

OVERVIEW OF PROCEDURE

Investigations into possible excessive/suspicious orders may be initiated through the following three sources:

- A.** Controlled Substance/Listed Chemical Order Monitoring Program
- B.** Notification by DEA
- C.** Notification by Distribution Center

A. Controlled Substance/Listed Chemical Order Monitoring Program

The following procedures will be conducted as part of the Controlled Substance/Listed Chemical Order Monitoring Program:

1. ABC has developed an Order Monitoring Program (OMP) for controlled substances and listed chemicals (See attached Exhibit A).
2. On a daily basis, the CSRA department will review an order monitoring report that identifies ABC customers whose ordering activity is in excess of the guidelines and parameters of ordering activity established by ABC. CSRA will investigate all orders in the "Hold" or "Cancelled" status to determine whether or not the orders are suspicious. Orders that are determined to be suspicious will reported to DEA with out being shipped.

3. On a monthly basis, the CSRA department will review a customer product mix report that will identify customers purchasing greater than a pre-determined percentage of controlled substances vs. non-controlled substances. A CSRA associate will investigate and identify customers whose purchasing activity warrants further review.
4. A one year purchase history for controlled substances and/or listed chemical products will be reviewed by the CSRA associate for each customer identified in steps #2 and 3.
5. A CSRA associate will consult with the appropriate Distribution Center (DC) and account manager regarding the customer's ordering patterns. If the CSRA associate determines that further investigation is appropriate, additional investigative steps will include a completion of ABC's Retail Pharmacy Questionnaire (CSRA I Form 590) and a customer site visit will be conducted by an ABC associate within two (2) business days.
6. A CSRA associate will conduct a final review with the CSRA Director after all relevant information has been obtained in order for the CSRA Director to determine the appropriate resolution of the investigation, which, following consultation with the Legal Department, may include immediate cessation of sales of controlled substances and/or listed chemical products to the customer.
7. If sales of controlled substances and/or listed chemicals to the customer are to be continued, such sales will be conditioned upon the customer signing one of the following documents:
 - a. Non-Internet Pharmacy Agreement (CSRA I Form 590a)
 - b. Internet Pharmacy Compliance Agreement (CSRA I Form 590b)

Non-Internet Pharmacy Agreement

If the customer does not participate in an internet pharmacy operation, an authorized customer representative will be required to sign a Non-Internet Pharmacy Agreement (CSRA I Form 590a).

Internet Pharmacy Compliance Agreement

If the customer participates in an internet pharmacy in which controlled substances are dispensed, an authorized customer representative will be required to sign an Internet Pharmacy Compliance Agreement (CSRA I Form 590b).

8. If the customer signs the CSRA I Form 590a, the signed agreement will be maintained in the file and the account will remain open and be closely monitored.
9. If the customer declines to sign the agreement, CSRA will remove the customer's ability to purchase controlled substances and/or listed chemicals.

B. Notification by DEA

If ABC receives notice from the DEA of possibly excessive or suspicious purchasing activity, CSRA will follow Steps 4 through 9 described above. DEA will also be notified upon completion of the investigation and will be advised of the disposition of the account.

C. Notification by Distribution Center

If an ABC Distribution Center receives notice of possibly excessive or suspicious Purchasing activity, CSRA will follow Steps 4 through 9 described above.

- D.** CSRA will establish and maintain a “DO Not Sell List” of customers in which ABC has ceased distribution due to suspicious activity, as well as pharmacies identified by other sources. CSRA will maintain a distribution list of Sales and Management associates and will regularly update and distribute the “Do Not Sell List”.